

REMARKS

In the Office Action the Patent Office objected to the information disclosure statement filed June 20, 2001, and required more legible copies of the references cited therein. Applicant is in the process of obtaining legible copies of the references cited in that Information Disclosure Statement and will provide the same in a Supplementary Information Disclosure Statement promptly, as discussed with the Examiner on December 10, 2003 by the undersigned's assistant, Evelyn Menjivar.

The Patent Office further objected to the abstract of the disclosure. The specification has been amended to provide an abstract of the invention as required by the Patent Office.

Claims 1-53 are pending in the above-referenced patent application. All of the claims were rejected. Specifically, Claims 1-5, 8-22, 25-40, 43-53 are rejected under 35 U.S.C. 102(e) as being anticipated by USPN 6,520,221 B1 to Hara et al. ("Hara"). Claims 6-7, 23-24 and 41-42 were rejected under 35 USC 103(a) as being unpatentable over Hara in view of USPN 6,101,530 to Rosenberg et al. ("Rosenberg").

Claim Rejections Under 35 U.S.C. 102(e)

Rejection of claims 1-5, 8-22, 25-40, 43-53 under 35 U.S.C. 102(e) as being anticipated by Hara is respectfully traversed because Hara does not disclose all of the limitations of the Claims.

As per Claim 1, Hara does not disclose: "A method for providing user interfaces in a first network including first devices interconnected via a communication medium and at least one interface device connecting said first network to at least a second network providing services, the user interfaces for controlling the devices that are currently connected to the first network and furnishing services of the second network to at least a user," as required by Claim 1. The Patent Office has not stated where in Hara such limitations are disclosed.

Further, Hara does not disclose: "in each of one or more devices in the first network: (a) obtaining information from one or more of said first devices currently connected to the first network, said information including device information," as required by Claim 1. The Patent Office interprets Hara to disclose such limitations in: col. 5, lines 47-50, 63-65; col. 6, lines 10-15, 33-37; col. 8, lines 25-36, 47-50. Applicant respectfully traverses such interpretation of Hara. Indeed, Hara is non-analogous art because Hara is only concerned with a communication path control device, communication path control method, and communication path control unit. This has nothing to do with the claimed invention. Hara is directed to a data path control device with a first interface section for connecting to a LAN, second interface section for connecting to

an external network through a small transmission capacity two-way line such as a telephone line, and third interface section for receiving a large capacity data from a large transmission capacity one-way line such as a satellite broadcast line. The data path control device changes the sender address of the data transmitted from a computer to a network based on a previously set correspondent relationship, thereby controls the path so that the large capacity data from the network is transmitted through the large transmission capacity one-way line. A path of the reply data from a network responsive to the request data from a computer outputted to an external network is selected by the computer side, and in the case that the reply data is composed of large capacity data, a satellite line having a large transmission capacity can be selected. (Abstract).

Further, there is no user interface in Hara for user control of devices connected to a first network, and user communication with devices connected to a second network. The phrase "user interface", or anything similar, is not even used in Hara as it may relate to the claimed invention herein.

In the passages relied upon by the Patent Office, Hara states:

The demultiplexer/depacketizer 14b is a component which separates the multiplexed input data and returns it to a packet, and extracts the data portion from the packet. The extracted data portion is sent to the declipper 14C.... Data is transmitted/received between the LAN 6 and network 3 through this interface section 15. (Hara, col. 5, lines 47-50, 63-65).

Comparing the content with the information registered in the RAM 19, the CPU 17 judges whether the data should be transmitted to the small capacity two-way line 5 without changing the data or should be transmitted to the small capacity

line 5 with changing the information of a sender contained in the transmitted data. This function is described hereinafter.... FIG. 3 shows a detailed exemplary connection for path controlling of the data transmitted/received between a computer and an external network using the data path control device 1 which is one embodiment of the communication path control device of the present invention. (Hara, col. 6, lines 10-15, 33-37).

Then, the data path control device 1 transmits the above-mentioned packet to the small capacity two-way line 5 which is judged to be a proper interface based on the destination of the packet. The content of the packet is then re-written as required based on the type of this packet. The rewriting is performed for controlling the path of a return data from the computer 8 connected to the Internet 23. More specifically, the information of the sender data included in the information is re-written. The information of the data sender is, for example, a source address in the packet in the case that the packet is an IP (Internet protocol) packet.... In the data transmitted from the computer 2a having an assigned address of X to the Internet 23, the address X is included as the sender address. (Hara, col. 8, lines 25-36, 47-50).

The Patent Office has not met its burden in explaining where in Hara a first network of devices connected to a second external network of devices is disclosed as claimed. And, as is clear from the above passages, there is no mention of obtaining information from first devices currently connected to the first network wherein the information including device information, as required by Claim 1. In the above passages, Hara is simply describing a connection for path controlling of the data transmitted/received between a computer and an external network using the data path control device 1 which is a communication path control device. Specifically, Hara described operation of the data path control device 1 with a first interface section 15 for connecting to a LAN 6 and data transfer between the LAN 6 and a network 3 via the interface 15. There is no step of obtaining information from first devices currently connected to the first

network wherein the information including device information, as required by Claim 1, wherein the device information is used to generate a user interface description as claimed.

Further, Hara does not disclose: "(b) generating a user interface description including: (1) at least one reference associated with the device information of each of said one or more first devices, and (2) at least one reference associated with the services provided by the second network," as required by Claim 1. The Patent Office interprets Hara disclose such limitations in: col. 2, lines 27-35, 50-54; col. 5, lines 59-67; col. 8, lines 22-29. Applicant respectfully traverses such interpretation of Hara.

In the passages relied upon by the Patent Office, Hara states:

It is the object of the present invention to provide a communication path control device and communication path control method provided with a function to control the communication path of data between networks and additionally data reception function from a satellite line. The communication path control device of the present invention proposed to solve the above-mentioned problem is a communication path control device for controlling communication paths between the first network and second network provided with the first interface section for connecting to the first network.... controlling communication paths between the first network and second network comprising the first transfer step for transferring the data inputted from the first network through the first interface section to the second interface section, the second transfer step for transferring the data from the second (Hara, col. 2, lines 27-35, 50-54).

The interface section 15 is an interface for connecting to the small capacity two-way line 5 such as terrestrial public lines. More specifically, this is a modem for connecting to an analog telephone line or TA (Terminal Adapter) for connecting to a digital telephone line such as ISDN. Data is transmitted/received between the LAN 6 and network 3 through this interface section 15. The interface

section 16 is an interface for connecting to the LAN 6 to which computers 2 are connected. (Hara, col. 5, lines 59-67).

FIG. 5 shows a schematic flow of data in the data path control device 1. When a computer user 2a wants to use various services provided from the Internet 23, the user takes accesses the router 7b that is an access point of the service provider. A packet of the data acquisition request transmitted from the computer 2a is delivered to the data path control device 1 by way of usual control in LAN 6. Then, the data path control device 1 transmits the above-mentioned packet to the small capacity two-way line 5 which is judged to be a proper interface based on the destination of the packet. The content of the packet is then re-written as required based on the type of this packet. (Hara, col. 8, lines 22-29).

In these passage, Hara simply discusses data transfer through interface devices 15 and 16 as controlled by the data path control device 1. Nothing in Hara is even remotely similar to “generating a user interface description including: (1) at least one reference associated with the device information of each of said one or more first devices, and (2) at least one reference associated with the services provided by the second network,” as required by Claim 1. There is not even a mention of a user interface or user interface description. The Patent Office has not met its burden of explaining how such limitations disclosed in Hara. For at least these reasons, it is respectfully submitted that rejection of Claim 1 and all claims dependent therefrom should be withdrawn. Further, Claims 18, 33, 36 and 51 were rejected on the same grounds as rejection of Claim 1. As such, for the above reasons provided in relation to Claim 1, rejection of Claims 18, 33, 36 and 51 should be withdrawn.

As per Claim 2, Hara, col. 5, lines 14-20 and col. 7, lines 4-8 (relied upon by the Patent Office) does not disclose that “the first network comprises a 1394 network, and the second

network comprises a non-1394 network,” as required by Claim 2. The Patent Office has not explained wherein in Hara a first network and a second network is described as claimed. And, in the passages relied upon by the Patent Office, there is no distinction made between 1394 and non-1394 networks as the first and second networks, respectively. For at least these reasons, rejection of Claim 2 should be withdrawn. Further, Claims 19 and 37 were rejected on the same grounds as rejection of Claim 2. As such, for the above reasons provided in relation to Claim 2, rejection of Claims 19 and 37 should be withdrawn.

As per Claim 3, Hara, col. 4, lines 41-47; col. 5, lines 28-35 and col. 6, lines 45-50 (relied upon by the Patent Office) does not disclose that “the interface device comprises a gateway device,” as required by Claim 3. The word “gateway” is not even mentioned in Hara. As such, rejection of Claim 3 should be withdrawn. Further, Claims 20 and 38 were rejected on the same grounds as rejection of Claim 3. As such, for the above reasons provided in relation to Claim 3 rejection of Claims 20 and 38 should be withdrawn.

Claim 4 adds further limitation to Claim 1, not disclosed by Hara, and should therefore be allowed for at least the reasons provided in relation to Claim 1. Further, the computer 2 in Hara is not a second, external network, as claimed herein. Claims 21 and 39 were rejected on the same grounds as rejection of Claim 4. As such, for the above reasons provided in relation to Claim 4 rejection of Claims 21 and 39 should be withdrawn.

Claim 5 adds further limitation to Claim 4, not disclosed by Hara, and should therefore be allowed for at least the reasons provided in relation to Claims 1 and 4. Further, the computer 2 in Hara is not a second, external network, and Hara does not disclose that the second devices provided services as claimed herein. Claims 22 and 40 were rejected on the same grounds as rejection of Claim 5. As such, for the above reasons provided in relation to Claim 5 rejection of Claims 22 and 40 should be withdrawn.

As per Claim 8, Hara, col. 9, lines 30-35 (relied upon by the Patent Office) does not disclose that “each reference in the user interface description associated to services provided by the second network comprises at least one hyper-text link to service information in the second network,” as required by Claim 8. As discussed in relation to Claim 1, Hara does not disclose a user interface description as claimed. And, in the passage relied upon by the Patent Office there is no mention of a user interface description or references therein that comprise hyper-text links to service information in the second network. The Patent Office has not explained how such limitations are disclosed in Hara. For at least these reasons, rejection of Claim 8 should be withdrawn. Claims 25 and 43 were rejected on the same grounds as rejection of Claim 8. As such, for the above reasons provided in relation to Claim 8 rejection of Claims 25 and 43 should be withdrawn.

As per Claim 9, Hara, col. 2, lines 27-35, 50-54; col. 5, lines 59-67 and col. 8, lines 22-29 (relied upon by the Patent Office), does not disclose displaying a user interface based on a user interface description, as claimed. As discussed in relation to Claim 1, Hara does not even disclose generating a user interface description that can be used for displaying a user interface for user control of said first devices and communication with the second network. For at least these reasons, rejection of Claim 9 should be withdrawn. Claims 26 and 44 were rejected on the same grounds as rejection of Claim 9. As such, for the above reasons provided in relation to Claim 9 rejection of Claims 26 and 44 should be withdrawn.

As per Claim 10, Hara, col. 2, lines 27-35, 50-54; col. 5, lines 59-67 and col. 8, lines 22-29 (relied upon by the Patent Office), does not disclose displaying a user interface based on a user interface description, as claimed. As discussed in relation to Claims 1 and 9, Hara does not even disclose generating a user interface description that can be used for displaying a user interface for user control of said first devices and communication with the second network. For at least these reasons, rejection of Claim 0 should be withdrawn. Claims 27 and 45 were rejected on the same grounds as rejection of Claim 10. As such, for the above reasons provided in relation to Claim 10 rejection of Claims 27 and 45 should be withdrawn.

As per Claim 11, Hara, col. 9, lines 30-35 (relied upon by the Patent Office), does not disclose generating a user interface description by associating a hyper-text link with the device

information of one or more of said first devices, and associating at least a hyper-text link with the service information provided by the second network, as claimed. As discussed in relation to Claims 1 and 9, Hara does not even disclose generating a user interface description that can be used for displaying a user interface for user control of said first devices and communication with the second network. For at least these reasons, rejection of Claim 11 should be withdrawn. Claims 34 and 52 were rejected on the same grounds as rejection of Claim 11. As such, for the above reasons provided in relation to Claim 11 rejection of Claims 34 and 52 should be withdrawn.

As per Claim 12, Hara, Hara, col. 2, lines 27-35, 50-54; col. 5, lines 59-67 and col. 8, lines 22-29 (relied upon by the Patent Office), does not disclose that the device information in each device in the first network includes a user interface description for user interaction with that device, and that the service information in the second network includes at least a user interface description for user interaction with a service. As discussed in relation to Claims 1 and 9, Hara does not even disclose generating a user interface description that can be used for displaying a user interface for user control of said first devices and communication with the second network. For at least these reasons, rejection of Claim 12 should be withdrawn. Claims 35 and 53 were rejected on the same grounds as rejection of Claim 12. As such, for the above reasons provided in relation to Claim 12 rejection of Claims 35 and 53 should be withdrawn.

As per Claim 13, Hara, Hara, col. 2, lines 27-35, 50-54; col. 5, lines 59-67; col. 8, lines 22-29 and col. 9, lines 3-50 (relied upon by the Patent Office) does not disclose that each reference associated with services provided by the second network comprises at least one hypertext link to service information in the second network, wherein the service information comprises at least identification information representing a service. As discussed in relation to Claims 1 and 9, Hara does not even disclose generating a user interface description that can be used for displaying a user interface for user control of said first devices and communication with the second network. For at least these reasons, rejection of Claim 13 should be withdrawn. Claims 28 and 46 were rejected on the same grounds as rejection of Claim 13. As such, for the above reasons provided in relation to Claim 13 rejection of Claims 28 and 46 should be withdrawn.

As per Claim 14, Hara, col. 9, lines 30-50 (relied upon by the Patent Office) does not disclose that the identification information comprises a logo information file including a link to a logo graphic representing the service. As discussed in relation to Claims 1 and 9, Hara does not even disclose generating a user interface description that can be used for displaying a user interface for user control of said first devices and communication with the second network. Further, the word “logo” is not even mentioned in Hara. For at least these reasons, rejection of Claim 14 should be withdrawn. Claims 29 and 47 were rejected on the same grounds as rejection of Claim 14. As such, for the above reasons provided in relation to Claim 14 rejection of Claims 29 and 47 should be withdrawn.

As per Claim 15, Hara, Hara, Hara, col. 2, lines 27-35, 50-54; col. 5, lines 59-67; col. 8, lines 22-29 and col. 9, lines 3-50 (relied upon by the Patent Office) does not disclose that the second network includes at least a first portal for providing services, and a reference associated with services provided by the second network comprises at least one hyper-text link to said first portal, wherein the first portal includes service information comprising at least identification information representing said services provided by the first portal. As discussed in relation to Claims 1 and 9, Hara does not even disclose generating a user interface description that can be used for displaying a user interface for user control of said first devices and communication with the second network. Further, there is no mention of a portal, service information or hyper-text links in Hara. For at least these reasons, rejection of Claim 15 should be withdrawn. Claims 30 and 48 were rejected on the same grounds as rejection of Claim 15. As such, for the above reasons provided in relation to Claim 15 rejection of Claims 30 and 48 should be withdrawn.

As per Claim 16, Hara, col. 9, lines 30-50 (relied upon by the Patent Office) does not disclose that the identification information in the first portal further comprises a hyper-link to service information provided by a second portal in the second network, as claimed. As dicussed in relation to Claim 15, does not disclose that the second network includes at least a first portal for providing services, and a reference associated with services provided by the second network comprises at least one hyper-text link to said first portal, wherein the first portal includes service

information comprising at least identification information representing said services provided by the first portal. Further, as discussed in relation to Claims 1 and 9, Hara does not even disclose generating a user interface description that can be used for displaying a user interface for user control of said first devices and communication with the second network. And, there is no mention of a portal, service information or hyper-text links in Hara. For at least these reasons, rejection of Claim 15 should be withdrawn. For at least these reasons, rejection of Claim 16 should be withdrawn. Claims 31 and 49 were rejected on the same grounds as rejection of Claim 16. As such, for the above reasons provided in relation to Claim 16 rejection of Claims 31 and 49 should be withdrawn.

As per Claim 17, Hara, col. 4, lines 49-60; col. 5, lines 47-50, 63-65; col. 6, lines 10-15, 33-37 and col. 8, lines 25-36, 47-50 (relied upon by the Patent Office) does not disclose that the second network comprises a plurality of interconnected computer systems programmed to provide services, the first portal comprises one or more of said computer systems providing services of the first portal, and the second portal comprises one or more of said computer systems providing services of the second portal, as claimed. There is no mention or first or second portals or anything remotely similar in Hara, and the Patent Office has not explained where such limitations are disclosed. For at least these reasons, rejection of Claim 17 should be withdrawn. For at least these reasons, rejection of Claim 17 should be withdrawn. Claims 32 and 50 were rejected on the same grounds as rejection of Claim 17. As such, for the above reasons provided

in relation to Claim 17 rejection of Claims 32 and 50 should be withdrawn.

Applicant notes that the Patent Office has rejection the claims by simply relying on passages in Hara, without specify or identifying elements or steps in Hara that disclose each limitation of the claim. If the claims are once again rejected, Applicant respectfully requests that the Patent Office refer to and specifically identify elements or steps in Hara that disclose the claimed limitations to allow that Applicant the opportunity to respond.

Claim Rejections Under 35 U.S.C. 103(a)

Rejection of Claims 6-7, 23-24 and 41-42 under 35 USC 103(a) as being unpatentable over Hara in view of Rosenberg is respectfully traversed because the references, alone or in combination, do not disclose all of the limitations of the claims.

As per Claim 6, as discussed above, Hara does not disclose limitations of Claim 4 from which Claim 6 depends. Further, Hara does not disclose that “the second network comprises the Internet, and at least one of said second devices providing services comprises one or more web servers providing services,” as required by Claim 6. However, the Patent Office states that using web servers is obvious as known by those skilled in the art because Rosenberg mentions web servers. Rejection of Claim 6 is respectfully traversed. The references do not provide any motivation to combine them. Nor is there a reason to modify Hara to include web servers.

It is well settled that in order for a modification or combination of the prior art to be valid, the prior art itself must suggest the modification or combination, "...invention cannot be found obvious unless there was some **explicit** teaching or suggestion in the art to motivate one of ordinary skill to combine elements so as to create the same invention." *Winner International Royalty Corp. v. Wang*, No. 96-2107, 48 USPQ.2d 1139, 1140 (D.C.D.C. 1998) (emphasis added). "The prior art **must provide** one of ordinary skill in the art the **motivation** to make the proposed molecular modifications needed to arrive at the claimed compound." *In re Jones*, 958 F.2d 347, 21 USPQ.2d 1941, 1944 (Fed. Cir. 1992) (emphasis added). Neither of the references suggests the motivation to modify or combine the references as proposed. The references are individually complete and functionally independent for their limited specific purposes and there would be no reason to make the modification proposed by the Patent Office. Therefore, because neither of the prior art references suggests the combination and modifications proposed by the Patent Office the combination and modifications are improper.

Even if the modification was legally justified, it still would not render Applicants' claimed invention obvious. The Patent Office admits that Hara does not teach all limitations in Claim 6. Therefore, the Patent Office attempts to modify Hara in order to teach Applicants' claimed invention. However, as discussed, there is no teaching in the references of the claimed limitations. Hara is non-analogous art and teaches away from the present invention.

Accordingly, the effort required to combine the teachings of the references would require a substantial undertaking and numerous elements which would not be obvious.

Further, Applicant respectfully submits that the Patent is improperly using “hindsight” and the teachings of Applicant’s own claimed invention in order to combine references to render Applicants’ claims obvious. The Office Action admits that Hara fails to teach all of the limitations of Applicant’s claimed invention. However, the Office Action improperly attempts to modify Hara using Rosenberg (which also fails to teach all of the limitations of Applicant’s claimed invention), in an attempt to achieve Applicant’s claimed invention. Therefore, for at least the above reasons, Claim 6 is patentably distinct from the cited references, alone or in combination. Accordingly, rejection of Claim 6, and dependent claims therefrom, should be withdrawn. For the same reasons, rejection of Claims 23 and 41, should be withdrawn.

As per Claim 7, Hara does not disclose the limitations of Claim 6 from which Claim 7 depends. Further, Hara does not disclose that “a service provided by at least one of the devices connected to the second network comprises a web site service,” as required by Claim 7. Nor does Rosenberg disclose such limitations. Rosenberg is simply directed to a method for providing force feedback over a network supporting TCP/IP protocols by: (a) sending from a client computer over a network supporting TCP/IP protocols, a connection request to a web server connected to the network that is hosting a desired URL; (b) receiving and processing an

HTML file at the client computer that was sent from the web server in response to the connection request, wherein the processing includes parsing an embedded force object reference having associated parameters and building a force object therefrom; (c) developing a force feedback signal with the force object; and (d) providing force feedback to a human/computer interface device coupled to the client computer in response to the force feedback signal. A networked force feedback system of the present invention includes a network, a first computer coupled to the network, and a second computer coupled to the network, where the second computer includes a visual display and a human/computer interface device capable of providing a second computer input and providing force feedback in response to a force feedback signal provided by the second computer. The second computer develops an image on the visual display that is associated with stored feedback information, such that the second computer produces the force feedback signal in response to at least one of information derived from the first computer and of the second computer input. (Abstract).

As such, as with Hara, Rosenberg has nothing to do with a method for providing user interfaces in a first network including first devices interconnected via a communication medium and at least one interface device connecting said first network to at least a second network providing services, the user interfaces for controlling the devices that are currently connected to the first network and furnishing services of the second network to at least a user, as claimed.

Neither of the references suggests the motivation to modify or combine the references as proposed. The references are individually complete and functionally independent for their limited specific purposes and there would be no reason to make the modification proposed by the Patent Office. Therefore, because neither of the prior art references suggests the combination and modifications proposed by the Patent Office the combination and modifications are improper.

Even if the modification was legally justified, it still would not render Applicants' claimed invention obvious. The Patent Office admits that Hara does not teach all limitations in Claim 7. Therefore, the Patent Office attempts to modify Hara in order to teach Applicants' claimed invention. However, as discussed, there is no teaching in the references of the claimed limitations. Hara is non-analogous art and teaches away from the present invention. Accordingly, the effort required to combine the teachings of the references would require a substantial undertaking and numerous elements which would not be obvious.

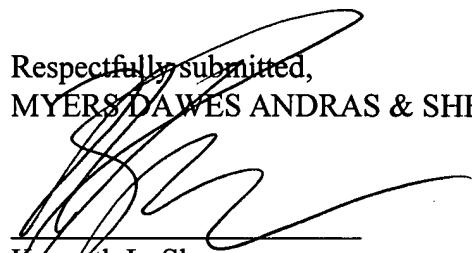
Further, Applicant respectfully submits that the Patent is improperly using "hindsight" and the teachings of Applicant's own claimed invention in order to combine references to render Applicants' claims obvious. The Office Action admits that Hara fails to teach all of the limitations of Applicant's claimed invention. However, the Office Action improperly attempts to modify Hara using Rosenberg (which also fails to teach all of the limitations of Applicant's

claimed invention), in an attempt to achieve Applicant's claimed invention. Therefore, for at least the above reasons, Claim 6 is patentably distinct from the cited references, alone or in combination. Accordingly, rejection of Claim 7, and dependent claims therefrom, should be withdrawn. For the same reasons, rejection of Claims 24 and 42, should be withdrawn.

Conclusion

For these and other reasons, it is respectfully submitted that the rejection of the claims should be withdrawn, and all of the claims be allowed. Accordingly, reexamination, reconsideration and allowance of all the claims are respectfully requested.

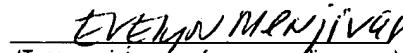
Respectfully submitted,
MYERS DAWES ANDRAS & SHERMAN

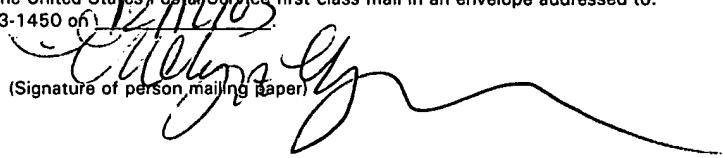


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